

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN**

SARAH,

Plaintiff,

v.

GOOGLE LLC, YOUTUBE LLC,
JAMES JACKSON, also known online as
“ONISION,” and LUCAS JACKSON,
formerly known online as
“LAINEYBOT,” “LAINEY” and “KAI,”
Defendants.

CASE NO.: 1:23-CV-00223
Hon. Hala Y. Jarbou

I, Lisa D. Haba, declare:

1. I am counsel of record for Plaintiff in this action. I am a Partner with The Haba Law Firm, PA and a member in good standing of the State Bar of Florida. I have been admitted to practice before the United States District Court for the Western District of Michigan.
2. I have personal knowledge of the facts stated herein, and, if called on to do so, could and would testify competently thereto. I make this Declaration in support of Plaintiffs’ Ex Parte Application for Contempt of Court and Request for Sanctions.
3. I am also attorney of record on behalf of Plaintiff Regina Alonso in a lawsuit against the same Defendants in the Middle District of Florida. I filed a Notice of Related Court Filings in both the Alonso case as well as this case. The filing in the Alonso case is attached as Exhibit C.
4. On April 7, 2023, I received e-service via ECF of Defendant James and Lucas Jackson’s corporate disclosures in the Alonso case, which contained Plaintiff’s full name, unredacted. This filing is attached as Exhibit A (redacted).

5. I emailed the attorney of record for James and Lucas Jackson immediately upon seeing this. I then provided that attorney the Order from this Court ordering the Defendants not to disclose Plaintiff's true identity. These email communications are attached as Exhibit D.
6. On April 11, 2023, I called the attorney for Defendants and left a message, flagging the message as urgent and requesting a call back in relation to the email that was sent on Friday.
7. As of the filing of this affidavit, I have not heard back from Defendants' counsel via email or phone.
8. I have contacted Michelle McLean, attorney of record in the Michigan case to obtain her position as to the filing of this Ex Parte Application. Ms. McLean stated that she takes the Court Order seriously and has taken it upon herself to attempt to reach Mr. Meyers and assist with this issue. Ms. McLean stated that she will do whatever action is in her power to assist with remedying the situation.

I declare under penalty of perjury and the laws of the United States of America that the foregoing is true and correct. Executed this 11th day of April, 2023 in Longwood, Florida.

/s/ Lisa D. Haba
Lisa D. Haba
Attorney for Plaintiff